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September 11, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: DCN Number 5-21000-OPS-92.05

Dear Mr. Lockhart,

Document Change Notice 92.05, which amends Operating Procedure FO.08, cannot be approved. By definition, environmental materials within an IHSS are potentially contaminated and therefore drill cuttings from must be drummed. The rationale for drumming cuttings from drilling operations within the Present Landfill (IHSS 114) and all other IHSSs is clarified in the proposed Operating Procedure FO.23 which addresses environmental material handling. This operating procedure is currently being reviewed by the Colorado Department of Health.

Since this DCN is not approved, the reference to it in the Table of Contents for EMD Operating Procedures Manual Volume 1: Field Operations should not be included.

If you have any questions regarding this matter, please call Carl Spreng of my staff at 331-4457.

Sincerely,

Gary W. Baughman, Chief
Facilities Section
Hazardous Waste Control Program

cc: Bob Birk, DOE
Marla Broussard, EG&G
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ADMIN RECCRD

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